

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LAWMAN ARMOR CORPORATION,	:	
	:	
Plaintiff,	:	Case No. 2:02-CV-04595-RK
	:	
v.	:	Judge Robert Kelly
	:	
WINNER INTERNATIONAL, LLC, and	:	
WINNER HOLDING LLC,	:	
	:	
Defendants.	:	
	:	

**DEFENDANTS' MOTION FOR LEAVE TO FILE A REPLY
TO PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT OF EQUITABLE ESTOPPEL**

Pursuant to Local Civil Rule 7.1(c), defendants, Winner International, Inc. (f/k/a/ Winner International, LLC) and Winner Holding LLC (collectively "Winner"), hereby move for leave to file a reply to the memorandum filed by defendant, Lawman Armor Corporation, in opposition to Winner's motion for summary judgment of equitable estoppel. The filing of a reply is necessary to address arguments asserted by Lawman for the first time in its opposition memorandum, including arguments based on a newly filed declaration by Paul Moreton.

Winner's reply memorandum is ***not*** being submitted concurrently with this motion for leave to file a reply, as Winner anticipates that the reply memorandum will need to be filed under seal.

WHEREFORE, Winner respectfully requests that this Court grant its motion for leave to file a reply to Lawman's opposition.

Respectfully submitted,

Date: February __, 2004

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CERTIFICATE OF SERVICE

I hereby certify that on February __, 2004, a copy of the foregoing **DEFENDANTS' MOTION FOR LEAVE TO FILE A REPLY TO PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT OF EQUITABLE ESTOPPEL** was served via messenger on the following attorney for plaintiff:

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